

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DANIEL GEORGE BROWN
Petitioner

V.

U.S. DEPT OF HOMELAND SECURITY, et al.,
Respondent.

FILED
HARRISBURG, PA

JUN 19 2020

PER


DEPUTY CLERK

**PLAINTIFF REQUEST FOR ENLARGEMENT OF PAGE NUMBERS OR
WORDS IN TRO**

Plaintiffs civil immigration detainees hereby respectfully request this Court for leave to file an enlargement to file motion for temporary restraining order (TRO) of less than 15,000 words including certificate of service under Federal Rules of Civil Procedures 65 attached to this motion request.

Reason why Enlargement should be granted

The TRO is a class of more than 30 Plaintiffs and requires numerous facts and to be seriously argue and contained less than 15,000 words. See TRO attached.

CONCLUSION

Plaintiff's Motion for enlargement is to be GRANTED as set forth in the above.

Dated: June 14, 2020

Signatures:

CERTIFICATE OF SERVICE

I certify that all parties were served as addressed on date below to:

Office of the Clerk
United States District Court
U.S. Courthouse
Middle District of Pennsylvania
228 Walnut Street
P.O. Box 983
Harrisburg, PA 17108

Angela Hoover, Warden
Clinton County Correctional Facility
58 Pine Mountain Road
Mc Elhattan, PA 17748

United States Attorney's Office
Middle District of Pennsylvania
Federal Building
Suite 220
228 Walnut Street
Harrisburg, PA 17108

Office of the United States Attorney's Office
District of Columbia
555 4th Street, NW
Washington, DC 20530

Lieutenant Gates
Clinton County Correctional Facility
58 Pine Mountain Road
Mc Elhattan, PA 17748

Lieutenant Powell
Clinton County Correctional Facility
58 Pine Mountain Road
Mc Elhattan, PA 17748

Lieutenant Probst
Clinton County Correctional Facility
58 Pine Mountain Road
Mc Elhattan, PA 17748

Dated: June 4, 2010

Signatures

Signatures

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Alejandro Acevedo *Alejandro Acevedo* 10000 5680
Gerty Togbasi *Gerty Togbasi* 10000 5750

Daniel Brown *Daniel Brown* A#-074-992-221;

Vu Tuan, A#-060-613-821; *Vu Tuan*

Son Lee,

Patel Nisarg, A#-061-544-218

Jhensy Saillant, *Jhensy Saillant* A#-062-280-757

Cipriano Rodriguez, *Cipriano Rodriguez* A#-090-766-958

Pena Jose, *Pena Jose* A#-034-205-798

Gilbert Grullom, *Gilbert Grullom* A#-090 766 958

Amjad Mohammed, *Amjad Mohammed* A#-099-384-130

Hooru Xie, *Hooru Xie* #100-005-669

Abel Helb, *Abel Helb* #100-005-267

Darius Kilby, *Darius Kilby* A#-100-005-473

Ofori Xentumi Jeremy, *Ofori Xentumi Jeremy* A#-096-672-758

Navin Singh, *Navin Singh* #100-003-700

Paul Johnson, *Paul Johnson* #100-003-706

Ajarhi Roberts, *Ajarhi Roberts* A#-100-005-615

Franciszek Bystron, *Franciszek Bystron* #097-615-784

Patel Bharatkumar, *Patel Bharatkumar* #100-005-848

Levon Margaryan, *Levon Margaryan* #100-004-645

Karireddy Bharatha, *Karireddy Bharatha* #100-005-834

Gary Lall, *Gary Lall* #100-005-819

Ishmael Kosh, *Ishmael Kosh* #100-005-842

Kelechi James, *Kelechi James* #100-005-663

George Graham, *George Graham* #100-005-747

Anthony Wilson, *Anthony Wilson* #100-005-522

Olalekan Abifarin, *Olalekan Abifarin* #100-005-764

Mohamed Kamara, *Mohamed Kamara* #100-005-654

Van H. Nguyen, *Van H. Nguyen* A#-042-363-518

Herrow Yahye, *Herrow Yahye* #100-005-177

Jaber Hammouda, *Jaber Hammouda* #100-005-796

Jose Ismael Dilone Lyon Rodriguez, *Jose Ismael Dilone Lyon Rodriguez* #100-005-702

Gorbenko Alex, *Gorbenko Alex* #10000 5740

ITAZ KHAN, *ITAZ KHAN* 100004644

Cheng Li, *Cheng Li* 10000 5708

Yang Hong, *Yang Hong* 10000 5794

Deron Joe, *Deron Joe* 10000 5650

Emil Sanchez 10000 5634

DECLARATION

Plaintiffs civil immigration detainees as signer below swear under the penalty of perjury and under the laws of the United States that the foregoing herein is true and correct. Plaintiffs certify that Plaintiffs understand and know that this is sufficient to comply with 28 U.S.C. Sec. 1746 and to render Plaintiffs the signer subject to prosecution under 18 U.S.C. Sec. 1621(a)(2) if any statements which Plaintiffs know to be false made herein and alleges that:

- (1) Plaintiffs Confined at CCCF on G-Unit;
- (2) Plaintiffs affected by either one or more or all of this issues presented in this TRO;
- (3) Plaintiffs are civil immigration detainees; and
- (4) Plaintiffs seek the responsible parties to take action as requested.

Dated: June~~4~~, 2020
McElhattan, Pennsylvania

Signatures

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Gerty Togbasi ~~110000 5750~~

Daniel Brown ~~Daniel Brown~~ A#-074-992-221;

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Son Lee,

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Jhensy Saillant, ~~111~~ A#-062-280-757

Cipriano Rodriguez, ~~111~~ A#-090-766-958

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Hooru Xie, ~~111~~ #100-005-669

Abel Helo, ~~111~~ #100-005-267

Darius Kilby, ~~111~~ A#-100-005-473

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Emil Sanchez 100005634